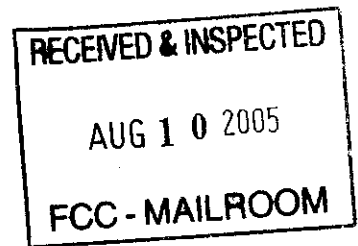


DOCKET FILE COPY ORIGINAL
Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 250
Alpharetta, Georgia 30005



Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

August 9, 2005

VIA PRIORITY FEDERAL EXPRESS DELIVERY

Attn: Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, Maryland 20743

Re: **Subscriber Notification Report
SMR Advisors, Inc. doing business as Talk Parade
VoIP E911 Compliance Letter
WC Docket No. 05-196**

Dear Ms. Dortch:

Pursuant to WC Docket No. 05-196, please accept this original Compliance Letter and four (4) copies as SMR Advisors, Inc. doing business as Talk Parade's response to provide E911 capabilities to subscribers.

A copy of this Compliance Letter is also being sent to Mr. Byron McCoy, Telecommunications Consumers Division; Ms. Kathy Berthot, Spectrum Enforcement Division; Ms. Janice Myles, Competition Policy Division; and Best Copy and Printing, Inc., Commission's copy contract via e-mail on August 9, 2005 pursuant to the FCC's Interconnected VoIP service providers to provide E911 capabilities July 29, 2005 Order.

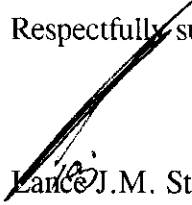
I have also enclosed an extra copy of this letter to be time stamped and returned to me in the enclosed, pre-addressed, postage prepaid envelope.

No. of Copies rec'd 0 + 4
List A B C D E

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 2

If you have any questions or if I may provide you with additional information, please contact me at the above address, telephone number or e-mail. Thank you for your attention to this matter.

Respectfully submitted,



Lance J.M. Steinhart
Attorney for SMR Advisors, Inc.
doing business as Talk Parade

Enclosures

cc: Mr. Bob Charish

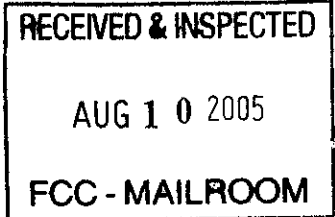
Mr. Byron McCoy (via e-mail to: byron.mccoy@fcc.gov)
Telecommunications Consumers Division, Enforcement Bureau

Ms. Kathy Berthot (via e-mail to: kathy.berthot@fcc.gov)
Spectrum Enforcement Division, Enforcement Bureau

Ms. Janice Myles (via e-mail to: janice.myles@fcc.gov)
Competition Policy Division, Wireline Competition Bureau

Best Copy and Printing, Inc. (via e-mail to: fcc@bcpiweb.com)
Commission Copy Contractor

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 3



Subscriber Notification Report

WC Docket No. 05-196
SMR Advisors, Inc. doing business as Talk Parade

1. A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);

Response: Effective Aug 8 2005 SMR included into its signup process notification, that E911 is available in certain markets and not available in others. (Exhibit A) We required customers to acknowledge if E911 was not available that they would need another method to contact emergency personnel. If E911 is available in their requested area they had to acknowledge reading a detailed description of it limitations and how it differs from traditional E911. (Exhibit B)

On 8/5/05 we sent an e-mail to our customers asking them to come to our website and acknowledge that they are aware that there is no E911 on their line or if E911 is available in their area to change their number to an E911 enabled number immediately or to enable E911 on their current number which would be effective prior to Nov 28th. (Exhibit C). (SMR is working with our underlying provider Sipmedia to enable existing lines with E911).

2. A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005;

Response: As of Aug 8 2005 Fifty nine (40%) percent of our customers have acknowledged the SMR's E911 Notification.

We estimate that 30% – 40% of our customer will not acknowledge by Aug 29.

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 4

3. A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);

Response: As of Aug 9th SMR will include in its shipment of all phone adapters a sticker notifying customer of SMR's E911 service and its limitations. Over the next two weeks we will be mailing stickers to all existing customer specifying the limitations of SMR's E911 service.

4. A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above;

Response: As of Aug 5, 2005 we have sent email notification to 100% of our customer base requiring them to acknowledge E911 Notification.

As of Aug 8, 2005 we have not sent any stickers to any customers.

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 5

5. A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005;

Response: Starting Aug 8th. Customers that have not acknowledged SMR's E911 Notification will be forced to listen to a recording on outbound calls that they must go to our website and acknowledge SMR's E911 Notification by Aug 29th or their service will be suspended

Starting Aug 8th. Customers that have not acknowledged SMR's E911 Notification will be called and be told that they must go to our website and acknowledge by Aug 29th or their service will be suspended.

Effective Aug 29th 2005 all customers that have not acknowledged the SMR's E911 Notification will be turned off until they acknowledge the SMR E911 notification or prove that they are located outside of the United States.

6. A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers; and

Response: All acknowledgments by our customer are being marked on their customer record in our databases for the date and if they acknowledged reading SMR's E911 Notification.

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 6

7. The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the VoIP E911 Order.

Response: Bob Charish
COO
SMR Advisors, Inc. doing business as Talk Parade
701 Madison Avenue
Lakewood, New Jersey 08701
(646) 722-7221
bcharish@sipmedia.com

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 7

Exhibit A

E911 Not available

Choose Enhanced 911

Note: If the rate center and city selected is currently not supported for E911 service, you must utilize an alternate method (such as dispatch, landline) to contact 911 emergency personnel.

Special Note:

E911 is not available in the rate center and city you have requested. Please read the disclosure below.

☐ I understand that if I decline the optional E911 service or if it is not available in my rate center, I will not be able to contact emergency 911 personnel using my Talkparade phone line.

[< Previous](#)

[Next >](#)

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 8

Exhibit A (cont'd.)

E911 Available

Choose Enhanced 911

If you are not a rate center selected by the state for E911 service, you must utilize an alternate method of contacting emergency personnel.

Special Note:

It appears that E911 is available in the rate center and city you have requested. This does not guarantee E911 will be available to you, but after we verify if your physical address supports E911 your request will be processed. For E911 to be approved your telephone number must be from the rate center and city in your emergency area, so if the physical address and the rate center do not match we will provide a number from the correct rate center for you. Click [here](#) for more information.

Would you like to have Enhanced 911 Service?

E911 Monthly Rate:	\$1.50
E911 Activation Fee:	\$15.00

☐ Yes ☒ No

☐ I understand that if I decline the optional E911 service or if it is not available in my rate center, I will not be able to contact emergency 911 personnel using my Talkparade phone line.

[← Previous](#)

[Next →](#)

Exhibit B

Talkparade Offers real E911 Service

Talkparade offers Enhanced 911 (E911) service which automatically routes emergency calls and provides caller information to emergency personnel at the local Public Safety Answering Point (PSAP).

Because Talkparade's E911 calls are routed as emergency traffic and accompanied by E911 caller information, callers should receive the same response from emergency personnel that they would receive from traditional phone 911 service. Talkparade's E911's implementation also eliminates the need for operators to ask callers their location, which could be crucial in cases where the caller may not be able to verbally communicate due to the emergency.

Most, broadband phone service providers either do not support 911 emergency calls or route emergency calls to administrative lines of PSAPs this results in calls not be handled with the urgency of a 911 call.

Talkparade's E911 Service

If you subscribe to Talkparade's E911 Service, your emergency call will automatically go to the PSAP that handles all 911 Emergencies and the emergency operator will automatically be presented your telephone number and location information via telephone and computer-based systems respectively. All you will have to do is state the emergency, and if you cannot speak, the PSAP operator will still know your location.

Talkparade's E911 support is an optional service for all our service plans for which subscribers pay a one time activation fee of \$15.00 and \$1.50 monthly fee. If you decline E911 service, you will not have direct access to emergency personnel via your Talkparade line. Though Talkparade's E911 service is not yet available in all areas, we are expanding the service as quickly as possible. If E911 is not yet available in your area, we encourage you to check back frequently.

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 10

Exhibit B (Cont'd.)

Service Outages and an address change can prevent E911 access

Talkparade service, including E911 service, ***will not*** function during an electrical power or broadband provider outage. You must subscribe to Talkparade's E911 and provide the physical location of your Talkparade line for E911 dialing on your phone to function. When you sign up for Talkparade E911 service, you must fill out a short form that tells us your actual physical address. We will verify that your telephone number and address are supported by our E911 service. If Talkparade E911 service is available, when you dial 911, the call will be routed to the local PSAP designated for the address you have registered with Talkparade.

Unlike traditional phone service, Talkparade service is portable to any location with broadband Internet access. You can also take your phone adapter with you on a trip, but when you travel, Talkparade E911 service will automatically route your call to the local emergency personnel location for the address on file, not your temporary location.

If you move, you **MUST** provide your new location. You can conveniently update your new location online. It may take several days to update your designated address of record.

Talkparade E911 service is not available on SoftPhones or Virtual numbers.

Ms. Marlene H. Dortch
Commission Secretary
VoIP E911 Compliance Letter
August 9, 2005
Page 10

Exhibit C

E911 Service Request for: 6467752128

Upgrading to E911 service costs \$1.50 a month in addition to your monthly service plan. There is also a one-time activation fee of \$15.00.

At this time, you have two ways to upgrade to E911 service:

- Option 1: You can upgrade immediately (allow 7 business days for processing) and we will assign a new phone number to you.
- Option 2: You can choose to upgrade using your existing phone number and this will take affect sometime before November 28th, 2005.

You will not be charged the activation fee and additional monthly fee until the e911 service is activated.

You will be notified by email when your e911 service is effective.

How would you like to upgrade to E911 service ?

- ☐ Option 1: activate now with a new number
- ☐ Option 2: activate with my existing number (to be converted by Nov. 28th)

→ Submit